

**UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION**

**NORTHWEST ENVIRONMENTAL  
DEFENSE CENTER, CENTER FOR  
BIOLOGICAL DIVERSITY, THE  
CONSERVATION ANGLER, and  
WILLAMETTE RIVERKEEPER,**

Plaintiffs,

v.

**FEDERAL EMERGENCY MANAGEMENT  
AGENCY, et al.,**

Defendants.

Case No. 3:23-cv-01335-SI

**JOINT NOTICE OF RELATED CASE**

Pursuant to Civil L.R. 42-2, counsel for the parties in the above-captioned matter state as follows:

On January 6, 2025, *amici* Oregonians for Floodplain Protection (“Oregonians”) filed a lawsuit in the U.S. District Court for the District of Columbia (Civ. No. 1:25-cv-00039) (complaint filed herewith as Exhibit 1). Among other claims, the Oregonians challenge the Federal Emergency Management Agency (“FEMA”) Pre-Implementation Compliance Measures (“PICM”) that are the subject of the parties’ summary judgment briefing in the above-captioned matter.

On January 7, 2025, the Oregonians filed a motion for preliminary injunction concerning the PICM. On January 9, 2025, the Plaintiffs in the above-captioned matter filed a motion to intervene as defendants in the District of Columbia matter. These motions are currently pending.

Respectfully submitted,

LISA L. RUSSELL  
Deputy Assistant Attorney General  
U.S. Department of Justice  
Environment & Natural Resources Division

Date: January 23, 2025

/s/ Mark Arthur Brown  
MARK ARTHUR BROWN  
D.C. Bar No. 470050  
Senior Trial Attorney  
Wildlife and Marine Resources Section  
U.S. Department of Justice  
P.O. Box 7611  
Washington, D.C. 20044-7611  
Phone: 202-305-0204  
Fax: 202-305-0275  
E-mail: mark.brown@usdoj.gov

Attorneys for Defendants

/s/ Chelsea Stewart-Fusek  
Chelsea Stewart-Fusek, OSB # 224994  
Center for Biological Diversity  
P.O. BOX 11374  
Portland, OR 97211  
Telephone: (971) 717-6425  
Email: cstewartfusek@biologicaldiversity.org

/s/ Mary Stites  
Mary Stites, OSB # 225005  
Northwest Environmental Defense Center  
10101 S. Terwilliger Blvd.  
Portland, OR 97219  
Telephone: (503)-768-6726  
Email: mary@nedc.org

/s/ Ryan Shannon  
Ryan Shannon, OSB # 155537

Center for Biological Diversity  
P.O. BOX 11374  
Portland, OR 97211  
Telephone: (971) 717-6407  
Email: [rshannon@biologicaldiversity.org](mailto:rshannon@biologicaldiversity.org)

Attorneys for Plaintiffs